

EXHIBIT 15

Janitens, Erik

From: Greeson, Robert
Sent: Monday, July 9, 2018 12:35 PM
To: 'William Ramey'
Cc: Victoria Kubitskey; Cameron Bautsch; Janitens, Erik
Subject: RE: WPEM v. SOTI

If a prior document (or any other publicly available system, etc.) demonstrates each accused product “element” you contend must be present to infringe a patent claim actually existed before the patent, the patent is necessarily invalid under section 102.

Either way – we will send you documents showing the accused product was publicly available before the asserted patent, which should end the case. I have already told you we found public sources, including the “way back” website, showing the accused product was publicly before the priority date of the asserted patent.

From: William Ramey [mailto:wramey@rameyfirm.com]
Sent: Monday, July 9, 2018 12:29 PM
To: Greeson, Robert <robert.greeson@nortonrosefulbright.com>
Cc: Victoria Kubitskey <vkubitskey@rameyfirm.com>; Cameron Bautsch <Cbautsch@rameyfirm.com>; Janitens, Erik <erik.janitens@nortonrosefulbright.com>
Subject: RE: WPEM v. SOTI
Importance: High

Robert,

Also, we disagree with your premise. Accused products have elements, it would be those elements that infringe the patent. A product name and date of availability are not dispositive of any issues, as element, or technical features, are constantly updated.

Thanks,

Bill

From: Greeson, Robert <robert.greeson@nortonrosefulbright.com>
Sent: Monday, July 09, 2018 12:07 PM
To: William Ramey <wramey@rameyfirm.com>
Cc: Victoria Kubitskey <vkubitskey@rameyfirm.com>; Cameron Bautsch <Cbautsch@rameyfirm.com>; Janitens, Erik <erik.janitens@nortonrosefulbright.com>
Subject: RE: WPEM v. SOTI

Ok.

To be more specific, whether the “January 2013 documents [] disclose [y]our patented claims” is an issue we might argue over (while SOTI does state they invalidate the claims), but the simpler issue is that the documents show, at a minimum, the accused product was publicly available before the priority date of the patent. So, to the extent you argue the accused product infringes, therefore, it necessarily invalidates the claims.

--rg

From: William Ramey [<mailto:wramey@rameyfirm.com>]
Sent: Monday, July 9, 2018 12:05 PM
To: Greeson, Robert <robert.greeson@nortonrosefulbright.com>
Cc: Victoria Kubitskey <vkubitskey@rameyfirm.com>; Cameron Bautsch <Cbautsch@rameyfirm.com>; Janitens, Erik <erik.janitens@nortonrosefulbright.com>
Subject: RE: WPEM v. SOTI

Robert,

We are developing the facts on the SOTI and AT&T.

Thanks,

Bill

From: Greeson, Robert <robert.greeson@nortonrosefulbright.com>
Sent: Monday, July 09, 2018 12:02 PM
To: William Ramey <wramey@rameyfirm.com>
Cc: Victoria Kubitskey <vkubitskey@rameyfirm.com>; Cameron Bautsch <Cbautsch@rameyfirm.com>; Janitens, Erik <erik.janitens@nortonrosefulbright.com>
Subject: RE: WPEM v. SOTI

Yes, we will send some exemplary document for your consideration under FRE 408.

Also, I recall you were going to look into the issue of prior disclosure to SOTI and/or ATT – what did you determine?

--Robert

From: William Ramey [<mailto:wramey@rameyfirm.com>]
Sent: Monday, July 9, 2018 12:00 PM
To: Greeson, Robert <robert.greeson@nortonrosefulbright.com>
Cc: Victoria Kubitskey <vkubitskey@rameyfirm.com>; Cameron Bautsch <Cbautsch@rameyfirm.com>
Subject: WPEM v. SOTI
Importance: High

Robert,

I was under the impression you were going to send some prior art documents? I believe you thought you had January 2013 documents that disclose our patented claims?

Thanks,

Bill

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